

REMARKS

Reconsideration of this application is respectfully requested.

Claims 1-9 are currently pending in this application. In the Office Action, the Examiner has rejected the Claims as follows. Claims 1-9 were rejected under 35 U.S.C §102(e) as being anticipated by *Vazvan et al.* (U.S. Patent No. 6,400,946)

The present invention is directed to an apparatus and method for selecting an access network in a mobile station which is capable of receiving a service from multi-wireless communication networks. In particular, the invention, as claimed, allows for selecting a user-centered access network where a plurality of different wireless communication networks may coexist.

Regarding independent Claims 1, the Examiner alleges that *Vazvan*, in Figure 2, discloses the recitation of a physical layer for communicating with the multi-wireless communication network, as recited by Claim 1 of the present application. After reviewing Figure 2 of *Vazvan*, Applicants respectfully disagree.

Figure 2 of *Vazvan* merely discloses a simplified block diagram of a mobile terminal. In Fig 2, as specifically described in Column 7, Lines 62-68, the block diagram shows, schematically, an example of the implementation of a network selection function in a terminal (16) where the terminal is defined as a data terminal equipment (DTE) having terminal adaptation functions (TAF) represented by reference number (18) and a means for performing the selection or optimization referenced by number (19).

In this instance, the Examiner incorrectly equates the block diagram depicted in Figure 2 of *Vazvan*, with the physical layer structure depicted in Figure 3 and described in paragraphs 0031-0035 in the specification of the present application. Specifically, in Figure 3 of the present application, a hierarchal structure of a mobile station, consisting of

four (4) inter-connected layers, is shown. As taught by the present application and recited in the Claims, one layer of the inter-connected layers comprises a convergence layer which includes an Access Network Selector (ANS) that interfaces with the other accompanying layers within the structure. The ANS, in effect, maps an access network to a user's menu and manages information on available or connectable access networks. The ANS also manages a user's plan or, rather, information on an access network the user desires to access. (See Abstract.)

Thus, in contrast with the present invention, Figure 2 of *Vazvan* fails to teach or even fairly suggest the recitation of "a physical layer which functions as a communication means for communicating with the multi-wireless communication network," as recited by Claim 1. (See also paragraphs 0031-0035 and Figure 3 of the present application.)

Accordingly, as *Vazvan* does not teach or suggest each and every claim limitation of Claim 1, Applicants respectfully request that the rejection of Claim 1 under 35 U.S.C. §102(e) be withdrawn.

Regarding independent Claim 4, the Examiner alleges that *Vazvan*, in Column 6, Lines 25-40 and 55-68, teaches the recitation of "when communication is requested, providing a user with information on an available network from information stored in the mapping table and communicating with a particular network selected by the user," as recited by Claim 4 of the present application. After reviewing the cited lines of *Vazvan*, Applicants respectfully believe that the Examiner's assertions are incorrect.

First, Column 6, Line 25-40 of *Vazvan* merely discloses that PQ (price-quality) selection may be integrated in existing mobile stations and the possible advantages thereof; second, Column 6, Line 55-68 simply states that users of mobile terminals can toggle between automatic or manual PQ selection and, thus, they can select a network based on price or quality or both. In this case, the recitation of providing a user with

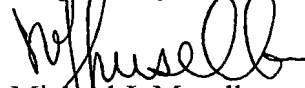
based on price or quality or both. In this case, the recitation of providing a user with information on an available network from information stored in the mapping table and communicating with a particular network selected by the user is neither disclosed nor suggested in the cited lines of *Vazvan*.

Accordingly, since *Vazvan* fails teach or suggest each and every claim limitation of Claim 4, Applicant respectfully requests that the rejection of Claim 4 under 35 U.S.C. §102(e) be withdrawn.

Regarding the rejection of dependent Claims 2, 3, and 5-9 under 35 U.S.C. §102(e), Claims 2, 3, and 5-9 are dependent claims; accordingly, if Applicants' arguments above place the independent claims into condition for allowance, then these dependent claims will also be in condition for allowance.

Accordingly, all of the claims pending in the Application, namely, Claims 1-9 are believed to be in condition for allowance. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters, the Examiner may contact Applicants' attorney at the number given below.

Respectfully submitted,



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